

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland DIVISION

ANDREW MORET

(Enter full name of plaintiff)

Plaintiff,

V.

Civil Case No. 2:24-cv-01105-AA

(to be assigned by Clerk's Office)

AMENDED

**COMPLAINT FOR VIOLATION OF CIVIL
RIGHTS (PRISONER COMPLAINT)**

CAPTAIN PARKS, SGT. JACKSON,
COORDINATOR K. MAIN, and
FIVE UNKNOWN STATE OFFICERS

(Enter full name of ALL defendant(s))

Jury Trial Demanded

Yes No

Defendant(s).

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: Andrew Guy Moret

Street Address: 2605 State St

City, State & Zip Code: Salem, OR 97310

Telephone No.: N/A

Defendant No. 1 Name: Captain Parks

Street Address: 777 Stanton Blvd.

City, State & Zip Code: Ontario, OR 97914

Telephone No.: (UNKNOWN)

Defendant No. 2 Name: Sergeant Jackson

Street Address: 777 Stanton Blvd.

City, State & Zip Code: Ontario, OR 97914

Telephone No.: (UNKNOWN)

Defendant No. 3 Name: K. Main, Coordinator

Street Address: 777 Stanton Blvd.

City, State & Zip Code: Ontario, OR 97914

Telephone No.: (UNKNOWN)

Defendant No. 4 Name: FIVE [5] UNKNOWN STATE OFFICERS

Street Address: 777 Stanton Blvd.

City, State & Zip Code: Ontario, OR 97914

Telephone No.: (UNKNOWN)

II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (*check all that apply*):

Federal officials (a *Bivens* claim)

State or local officials (a § 1983 claim)

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

8th Amendment U.S. Const. "cruel & unusual", possibly more.
DUE PROCESS

III. STATEMENT OF CLAIMS

Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

- On 8-8-2022 I was placed into a hostile living situation by CPT. PARKS (or) UNKNOWN Ofc. ASSIGNMENTS - SRC1, intentionally and/or in violation of PREA, assessment guidelines, causing a violent altercation & bruising. This also caused deployment of OC spray and great terror of being raped & killed.
- Upon request to SGT. JACKSON for a decontamination shower I was denied for 8½ hours covered in OC Spray. When I asked other UNKNOWN Ofc's, I was told "SGT. Jackson says to wait." PAIN Level 10+ for a long period of time. Sadistic treatment over time exacerbating phys. harms.

Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

DUE PROCESS (while incarcerated)
(Please incorporate Claim I to CLAIM II) (please do not join them.)

I did NOT do [#] \$9716.15 worth of damage to AIC Irwin, Matthew #2177008 at any time, ever. UNKNOWN Officers billed me that amount fraudulently, and they refused me a copy of THE BILL. Such a BILL may not truly exist.

State Law requires disclosure of a redacted BILL (OAR 291-037-0028(3)) this deceit protected UNKNOWN Officers from blame for unlawful cell placement (CLAIM I) and OC SPRAY TORTURES. It cripples me financially.

Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

(Please incorporate all CLAIMS without joinder) Ending in 2024:

Defendant K. Main, Coordinator and/or UNKNOWN Officers prevented me from accessing the grievance system in retaliatory type ways, and for immoral reasons, & Deceitful reasons, violating 1st Amend. U.S. Const., while incarcerated = "redress of grievances", etc. Using deceit, She protected UNKNOWN Officers From blame.

(Dates & times true as stated in 2:23cv00715-HZ AMENDED COMPLAINT).

(If you have additional claims, describe them on another piece of paper, using the same outline.)

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

Yes No

V. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

SEEKING APPOINTED COUNSEL.

TBD. Declaratory Judgment.

POTENTIALLY: Reimbursement, and/or \$50,000.00
spread out over defendants, etc.

Prospective relief sought over & above monetary.

END EMPLOYMENTS POSSIBLY.

JUDICIAL CONFERENCE AT DISCRETION.

DECLARATION OF VERIFICATION: I swear under penalty of perjury
all claims in Amend. Comp. are true to the best of my abilities.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 08 day of JANUARY, 2025.


(Signature of Plaintiff)